

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

CAROLENG INVESTMENTS LIMITED,

Plaintiff,

v.

BLUESTONE RESOURCES, INC.,

Defendant.

Case No. 1:23-mc-00010

CONSENT MOTION TO TRANSFER VENUE TO ROANOKE DIVISION

COMES NOW, Bluestone Resources, Inc. (“BRI”), by counsel, and hereby moves to transfer venue to the Roanoke Division of this Court. In support thereof, BRI states as follows:

1. Caroleng Investments Limited (“Caroleng”) filed this action in the Abingdon Division of this Court seeking to seize a helicopter owned by BRI.
2. BRI and its operations are in the Roanoke Division and the helicopter at issue is typically stored in that Division.
3. BRI’s witnesses and records are also located in the Roanoke Division.
4. This action could have been filed in the Roanoke Division.
5. This Motion is brought pursuant to 28 U.S.C. §1404(b), which provides that “[u]pon motion, consent or stipulation of all parties, any action, suit or proceeding of a civil nature or any motion or hearing thereof, may be transferred, in the discretion of the court, from the division in which pending to any other division in the same district.
6. Likewise, under 28 U.S.C. §1404(a) “[f]or the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought.”

7. Based upon the above, for the convenience of the parties and witnesses and in the interest of justice, this matter should be transferred to the Western District of Virginia, Roanoke Division.

8. All interested parties, including 1st Source Bank, consent and join in the request to transfer venue in this matter.

9. A proposed Order is attached hereto as Exhibit A.

WHEREFORE, Bluestone Resources, Inc. respectfully requests that this Honorable Court grant the Motion to Change Venue, and enter an Order transferring this action to the Roanoke Division of the United States District Court for the Western District of Virginia.

Respectfully Submitted,

BLUESTONE RESOURCES, INC.

By: /s/ Aaron Balla Houchens
Of Counsel

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Counsel for Bluestone Resources, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November 2023, I electronically filed the foregoing with the Court's CM/ECF system, which will send notification of the same to all counsel of record.

/s/ Aaron Balla Houchens